

# Austin & Rogers, P.A.

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September 29, 2017

**VIA, ELECTRONIC FILING**

The Honorable Jocelyn Boyd  
Chief Clerk and Administrator  
The Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29210

Re: • **Docket Number 2017-10-E**  
• **Petition to Intervene**

Dear Ms. Boyd:

Enclosed for filing is Petitioner, South Carolina Solar Business Alliance, Inc.'s  
Petition to Intervene, Cover Sheet and Certificate of Service.

All parties of record have been served. Please notify the undersigned if you there is  
anything else you may need.

Respectfully Submitted,

/s/ \_\_\_\_\_  
Timothy F. Rogers

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**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2017-10-E**

IN RE: Duke Energy Carolinas, LLC's  
2017 Integrated Resource Plan (IRP)

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**PETITION  
TO  
INTERVENE**

A filing was made in Commission Docket 2017-10-E, on September 1, 2017, by Duke Energy Carolinas, LLC, ("DEC"). Petitioner herein is the South Carolina Solar Business Alliance, Inc., ("SCSBA" or "Petitioner"). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission's Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

1. SCSBA is a Public Benefit Non-Profit Corporation, by a conversion filing on May 17, 2017, with the South Carolina Secretary of State's office, originally organized on October 21, 2009, pursuant to Chapter 44 of Title 33 of the South Carolina Code of Laws and, since that date, remaining in good standing with the South Carolina Secretary of State.

2. SCSBA's principal place of business is currently co-located with that of Southern Current LLC at 1634 Ashley River Road, Charleston, South Carolina, 29407 and SCSBA's mailing address is currently co-located with that of the Hannah Solar Government Services, LLC at 1090 Jack Primus Road, Charleston, South Carolina, 29492.

3. SCSBA is organized for the purpose of promoting and advocating public policy positions supportive of solar power generation in South Carolina.

4. SCSBA is a Public Benefit Non-Profit Corporation, whose Board Members are the following individuals, all of whom conduct solar energy-related business in South Carolina under the company names indicated:

- a. Paul Fleury (Southern Current LLC);
- b. Grant Reeves (TIG Sun Energy I and II, LLC);
- c. Don Zimmerman (Alder Energy Systems, LLC);
- d. Dave McNeil (Hannah Solar Government Services, LLC);
- e. Bret Sowers, (Board Chairman), (Southern Current LLC);
- f. Jarrett Branham (SolBright Renewable Energy, LLC); and
- g. Emily Johnson (Hannah Solar Government Services, LLC).

5. SCSBA's more than fifty (50) Trade Members includes solar energy developers, engineering procurement and construction (EPC) contractors, professional service firms, equipment distributors and equipment manufacturers engaged in the business of solar energy generation in South Carolina and across the nation. All of SCSBA's Board Members' companies maintain offices in South Carolina.

6. SCSBA's Trade Members are financially impacted by DEC's filing, as is outlined in more detail herein and SCSBA has substantial business interests in South Carolina.

7. Specifically, Petitioner's Trade Members plan to conduct, business in DEC's assigned territory, including sales to DEC's Consumers and Petitioner has a material interest in DEC's filing.

8. DEC's annual IRP filing outlines potential infrastructure which will be needed to match DEC's forecasted electricity requirements.

9. Petitioner's position is that SCSBA has a direct and substantial interest in the review to be made by this Commission in this Docket, concerning this Commission's review of DEC's annual filing in South Carolina and Petitioner's interests cannot be adequately addressed by any other party in this Docket. Petitioner's further position is that Petitioner SCSBA will be impacted by DEC's IRP planning, which necessarily influences DEC's decision making, concerning demand-side and supply-side resources. Those decisions impact the cost of electricity for South Carolina consumers and therefore affect SCSBA's Trade Members. Therefore, the specifics of DEC's IRP are important to the Petitioner from a financial standpoint.

Petitioner's further position is that Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important issue raised in this Docket. As shown above, Petitioner has a direct and material interest in DEC's filing, and this Commission's review.

10. This Commission contemplated intervention in IRP filings, as stated in this Commission's Order No. 2012-97, and this Petition to Intervene is timely filed.

11. Petitioner, SCSBA has previously received approval for intervention from this Commission on numerous occasions, including in recent Commission Docket No. 2015-362-E, Docket No. 2015-8-E, Docket No. 2016-2-E, Docket No. 2016-1-E, Docket 2016-3-E, Docket 2016-9-E, Docket 2016-8-E, Docket 2016-10-E, Docket 2017-2-E, Docket 2017-1-E, and Docket 2017-3-E.

12. Furthermore, Petitioner's Intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before the Commission, and [Intervention] [is] allowed so that a full and complete record addressing...views and concerns can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).

13. Petitioner should be allowed to intervene in this Docket, with full rights of cross examination, discovery and participation in any Hearing to be scheduled in this Docket.

14. The granting of SCSBA's Petition to Intervene is (i) in the public interest (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed and (iii) contemplated in this Commission's Order 2012-97.

15. SCSBA is represented by counsel in this proceeding:

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**WHEREFORE**, Petitioner prays for the following relief:

- (a) That SCSBA's Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner, SCSBA be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as is just and proper.

Respectfully Submitted,

/s/

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Timothy F. Rogers,  
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803-251-7442  
Counsel for Petitioner, South Carolina Solar  
Business Alliance, Inc.

September 29, 2017  
Columbia, South Carolina

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2017-10-E**

IN RE: Duke Energy Carolinas, LLC's  
2017 Integrated Resource Plan (IRP)

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**CERTIFICATE OF SERVICE**

I, Carrie A. Schurg, an employee of Austin & Rogers, P.A., certify that I have served copies of the Cover Sheet, Petitioner, South Carolina Solar Business Alliance, Inc.'s Petition to Intervene and this Certificate of Service, as indicated below, via electronic mail on September 29, 2017.

**Frank R. Ellerbe, III**  
Email: fellerbe@sowellgray.com

**Heather Shirley Smith**  
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/s/ \_\_\_\_\_  
Carrie A. Schurg

September 29, 2017  
Columbia, South Carolina